

by Federal Rule of Civil Procedure 23, are satisfied in this case. Moreover, the requirements for certifying a Rule 23(b)(3) class are also met.

WHEREFORE, Plaintiffs Ramhari Subedi and Anirudra Gaire respectfully request that this Court enter an order certifying the following class:

All persons identified by Plaintiffs who paid a fee to Louise Merchant and/or International H-2B/J-1 Work & Travel USA, Corporation for the purpose of obtaining a H-2B or J-1 visa but did not receive a H-2B or J-1 visa procured by Louise Merchant and/or International H-2B/J-1 Work & Travel USA, Corporation.

RAMHARI SUBEDI AND
ANIRUDRA GAIRE, Plaintiffs,

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